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01/20/2006 01:26 PM

To Jim Jones/DC/USEPA/US@EPA
cc
Subject revised rodenticide letter

2006

January 20,

Mr. Jim Jones, Director
Office of Pesticide Programs 7505C
Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave. NW
Washington, D.C. 20460

Original following by mail

Dear Director Jones:

I wrote on behalf of the American Bird Conservancy in December 2005 to convey concerns surrounding the continuing registration review of rodenticides, and would like to clarify and revise our position, based upon new information and recent discussions held with pesticide and wildlife experts from California.

In December I stated we agreed with the position of the California Department of Pesticide Regulation's Pesticide Registration and Evaluation Committee that "second generation" rodenticides could potentially be safely used around children and non-target wildlife if these products were sold over-the-counter in tamper resistant pre-loaded bait stations. The letter emphasized that over-the-counter sales and household use would need to be closely monitored to evaluate the reduction in secondary raptor and predator poisonings, and further stated that if monitoring were to demonstrate that the above restrictive measures were not successful in reducing non-target wildlife exposures, ABC would petition to have all uses of these three rodenticides be made restricted use, and that these rodenticides be available only to licensed pest control operators.

After discussions with California Department of Fish and Game, and after a review of ABC's own Avian Incident Monitoring System (AIMS) database, we have become convinced that it would be impossible to implement a satisfactory system for monitoring and evaluating rodenticide uses in conjunction with the over-the-counter sales. We do not believe that it would be realistic to expect homeowners purchasing over-the-counter rat poisons to confine the uses to indoors only, even if that were explicitly stated on the label. As a result, we believe indiscriminate use of these three second-generation rodenticides would continue to secondarily poison raptors and mammalian predators. We also do not believe that "tamper-resistant" pre-loaded bait stations would provide sufficient protection for children from these potent second-generation rodenticides. As a result:

- We recommend that Brodifacoum, Bromadiolone, and Difethialone be re-registered as restricted use pesticides, and removed from the over-the-counter market.

Secondary poisoning of raptors and predators continues to be a significant problem for birds and wildlife in California and elsewhere, due to high residue levels in rodents killed with these chemicals. As a result:

- We recommend that the concentration of active ingredient for outdoor uses of restricted-use second-generation rodenticides should be lowered by 50% to reduce the potential for secondary poisoning of wildlife.

The remaining rodenticides under evaluation, including chlorophacinone, diphacinone, bromethalin, warfarin, zinc phosphide, and cholecalciferol, all have the potential to poison children and wildlife if used in an inappropriate or unsafe manner. The ABC AIMS database documents the poisoning of birds by most of these rat poisons, indicating that outdoor uses continue to pose a significant hazard to birds. Secondary poisonings were documented for chlorophacinone, diphacinone, strychnine, and warfarin. Poisoning of granivorous birds (wild turkeys, morning doves, killdeer, pigeons, mallards, black-billed cuckoo, gulls, etc.) by these compounds indicate that inappropriate outdoor application of poison grains have also led to direct poisoning of protected native birds. We believe the use of pre-loaded tamper resistant bait stations would significantly reduce direct wildlife poisonings, and that stronger label language may reduce secondary poisonings, if label directions are followed. As a result:

- We recommend that any of the above chemicals that are allowed to be marketed over-the-counter be sold only in pre-loaded tamper-resistant bait stations, and required to have clear explicit safety language on the labels for consumers, and a statement requiring the use of tamper-resistant bait stations when products are used outdoors.

American Bird Conservancy believes there are legitimate uses for rat poisons, but we are strongly concerned that untrained people frequently cause wildlife poisonings when these products are incorrectly used. Therefore, we urge the EPA to take action to restrict the use of rodenticides to prevent the poisoning of America's children, birds and other wildlife. Thank you for consideration of American Bird Conservancy's position on this important issue.

Sincerely,

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